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October 8, 2024

By ECF & Email

Hon. Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
50 Walnut Street
Newark, NJ 07102

Hon. Gregg A. Padovano, J.S.C.
Superior Court of New Jersey
Bergen County Justice Center
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Special Master Joseph A. Dickson, U.S.M.J. (Ret.)
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**Re: *In re Allergan Biocell Textured Breast Implant Prod. Liab. Litig.*, MDL No. 2921
In re Allergan Biocell Textured Breast Implant Prod. Liab. Litig., MCL No. 634
In re Allergan Biocell Textured Breast Implant Litig., LASC, JCCP No. 5104**

Dear Judge Martinotti, Judge Padavano, and Judge Dickson:

We write on behalf of the Plaintiffs in the actions above. Plaintiffs have reviewed Allergan's final submission regarding the alleged costs associated with the production of manufacturing batch records that Allergan seeks to shift to Plaintiffs. Plaintiffs have opposed Allergan's request for cost-shifting. Allergan has still not identified costs solely related to scanning as the Court previously ordered.

Nonetheless, Allergan's application remains of substantial importance to the Plaintiffs. Accordingly, Plaintiffs respectfully request oral argument on this matter

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at the November 12th or December 10th Case Management Conference or another convenient time before Your Honors make a final determination regarding cost shifting.

Thank you for your consideration.

Respectfully submitted,

/s/ Shanon J. Carson

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